

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

First-Class Mail and Periodicals  
Service Standard Changes, 2021

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Docket No. N2021-1

**ASSOCIATION FOR POSTAL COMMERCE  
FIRST INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS  
TO USPS WITNESS WHITEMAN (POSTCOM/USPS-T-2-1-2)**

May 11, 2021

Pursuant to 39 C.F.R. § 3020.117, the Association for Postal Commerce (“PostCom”) submits these interrogatories and requests for production to United States Postal Service (“USPS” or “Postal Service”) witness Curtis Whiteman (USPS-T-2). If the witness cannot answer a question or subpart or provide the data requested, PostCom requests that the Postal Service answer through another witness or submit an institutional response.

Respectfully submitted,

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**PostCom/USPS-T-2-1.** Please refer to page 2 of your testimony, where you state that the Postal Service’s FY2021 Integrated Financial Plan projects a loss of \$9.7 billion, absent legislative or regulatory reform. According to the March 2021 preliminary financial results reported to the Commission on Friday May 7, 2021, the Postal Service is reporting a net *income* of \$236 million so far in FY2021. Given these year-to-date results, does the Postal Service still expect to lose \$9.7 billion this year? If not, please provide an updated estimate.

**PostCom/USPS-T-2-2.** Please refer to page 4 of your testimony, where you claim that volume declines in USPS Marketing Mail are “mainly due to the increasing diversion of advertising spending from USPS Marketing Mail to digital media.”

- a. What other factors have contributed to the decline? If you cite any research or analysis, please provide that research or analysis or references to where that research or analysis is publicly available.
- b. Has the Postal Service examined to what degree the failure to meet service performance targets has contributed to the decline in Marketing Mail? If so, please provide that analysis.
- c. What steps has the Postal Service taken to arrest or slow the decline in Marketing Mail volume? For each specific effort, please provide any analysis indicating how effective that effort has been. If no analysis of the effectiveness of an effort has been undertaken, please so state.